

FISHER & PHILLIPS LLP
 300 S Fourth Street, Suite 1500
 Las Vegas, Nevada 89101

FISHER & PHILLIPS LLP
 SCOTT M. MAHONEY, ESQ.
 Nevada Bar No. 1099
 300 S. Fourth Street
 Suite 1500
 Las Vegas, NV 89101
 Telephone: (702) 252-3131
 E-Mail Address: smahoney@fisherphillips.com
 Attorney for Defendants, Station Casinos LLC
 And NP Red Rock LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSHUA HUSOK,)	Case No.: 2:20-cv-01939-KJD-DJA
Plaintiff,)	
)	STIPULATION AND ORDER TO
vs.)	EXTEND SCHEDULING ORDER
)	DEADLINES
)	(Fourth Request)
STATION CASINOS, LLC, a Nevada)	
Limited Liability Company; NP RED)	
ROCK, LLC, d/b/a RED ROCK)	
CASINO, RESORT AND SPA, a)	
Nevada Limited Liability Company;)	
ROE Business Organizations I-X; and)	
DOE INDIVIDUALS I-X, Inclusive,)	
)	
Defendants.)	

The parties, by and through their respective counsel hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery Deadline	January 28, 2022
Dispositive Motion Deadline	February 28, 2022
Joint Pretrial Order	March 30, 2022 or 30 days from the ruling on a dispositive motion

This is the fourth request for an extension of these deadlines. The parties provide the following information regarding the proposed extension of the discovery deadline.

Discovery Completed to Date

The parties have served their Initial Disclosures and supplements thereto. Defendants have served interrogatories and requests for production and Plaintiff has responded. Plaintiff has served two sets of interrogatories and two sets of requests for production and Defendants have responded. Jennifer Johnson has been deposed. Rita Oliveri and Kiernia Jimenez-Milan were deposed June 28. Plaintiff was deposed on July 12, but his cross-examination was postponed because Plaintiff's counsel had a flare-up of a medical condition that caused the deposition to stop. Antonio Nunez was deposed September 13. Tia Campbell and Betty Martin were deposed September 15. Nyemma Demmons was deposed September 22. Erika Hernandez and Sammy Flores were deposed October 19. Stacy King was deposed October 21. Plaintiff's deposition was concluded on October 25.

Remaining Discovery to Be Completed

A few depositions remain to be done, along with Rule 30(b)(6) deposition topics, and possible related written discovery.

Reasons Discovery Could Not Be Completed Within the Existing Deadline

The parties have been diligent in deposing the significant number of witnesses involved in this case, with eight depositions being taken since the last extension of discovery. The Court may recall that the parties have agreed to consolidate discovery in this case with discovery in the somewhat related case of *Farfan v. Station Casinos LLC et. al.* (Case No. 2:20-cv-01516-JAD-NJK), which requires additional time to prepare for and take each deposition. In addition to both counsel having the usual assortment of depositions, motions, hearings, mediations and appellate work in other cases, defense counsel had been preparing for a two-day arbitration hearing set for November 16 (that

1 hearing was postponed last week due to the discovery of a serious medical condition for
 2 the claimant therein). Also, Plaintiff's counsel remains preoccupied with the
 3 considerable ongoing health problems of an elderly parent and has her own serious
 4 health condition with flare-ups that currently impacts her ability to work at times.
 5 Among other things, this condition presently necessitates that depositions not be
 6 scheduled on consecutive days, which elongates the time discovery can be completed in
 7 all her cases.
 8

9 ***Proposed Dates for Completion of Discovery***

10 The parties believe they will be able to complete discovery by the proposed new
 11 date of January 28, 2022.

12 Dated this 8th day of November, 2021.

13 FISHER & PHILLIPS

14 KEMP & KEMP

15 By: /s/Scott M. Mahoney
 16 Scott M. Mahoney, Esq.
 17 300 S. Fourth Street #1500
 18 Las Vegas, NV 89101
 Attorney for Defendants

By: /s/Victoria L. Neal
 Victoria L. Neal, Esq.
 7435 W. Azure Drive #110
 Las Vegas, NV 89130
 Attorney for Plaintiff

19 IT IS SO ORDERED:

20 
 21 UNITED STATES MAGISTRATE JUDGE

22 Dated: November 9, 2021
 23
 24
 25
 26
 27
 28

FISHER & PHILLIPS LLP

300 S Fourth Street, Suite 1500
 Las Vegas, Nevada 89101